

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**v.**

**TIAWANA BROWN, et. al,**

**Defendant.**

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**DOCKET NO: 3:25CR106**

**DEFENDANTS' UNOPPOSED  
JOINT DISCOVERY MOTION**

Defendant Tiawana Brown, jointly with her codefendants, and without opposition by the Government, requests that the Court permit the Defense to treat discovery documents containing PII of codefendants as non-sensitive discovery. Non-sensitive discovery may be provided directly to the defendants in accordance with the discovery order.

1. This case is governed under the Standard Discovery Order. *See* Docket Entry at 5/23/25.
2. That order provides that "sensitive materials" shall remain in the custody of counsel and not be provided to a defendant.
3. It defines sensitive material (in relevant part) as material containing personal identifying information of another person.
4. In this case, the three codefendants are related, and each consent to the other receiving copies of documents that might contain their PII, and to otherwise treat that material as "non-sensitive."
5. All defendants join in this motion.
6. The Government, through AUSA Matt Warren, does not oppose this motion.

Defendant therefore moves the Court to allow the Defense to treat material containing the PII of a codefendant as 'non-sensitive' consistent with the enclosed proposed order.

Respectfully submitted, this the 9<sup>th</sup> day of June, 2025.

s/ Rob Heroy  
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s/ Kimberly Best  
Kimberly Best  
Counsel for Tijema Brown

s/Habekah Cannon  
Habekah Cannon  
Counsel for Antoinette Rouse

### **CERTIFICATE OF SERVICE**

I certify that I have served the foregoing **MOTION** on opposing counsel and all other parties, via ECF using the CM-ECF system, which will send notice of such filing to all registered CM/ECF users.

This the 9<sup>TH</sup> day of June, 2025.

s/ Rob Heroy  
W. Rob Heroy

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**PROPOSED ORDER**

This matter is before the Court based on an unopposed motion filed by Defendant Tiawana Brown, and joined by Codefendants Tijema Brown and Antoinette Rouse, requesting that the Court permit the defendants to treat materials containing the PII of codefendants as non-sensitive discovery material.

This motion is ALLOWED. If discovery in this case is deemed “sensitive material” based solely on the inclusion of personally identifying information of a codefendant, Defendants may treat that material as non-sensitive material. As such, Counsel may provide copies of that material to their clients.

All other provisions of the order remain in effect.

This is the \_\_\_\_ day of June, 2025.

\_\_\_\_\_  
Magistrate Judge Presiding